



ORIGINAL

18 MAG 6662

Approved: *E Hanft*

EMIL J. BOVE III/AMANDA L. HOULE/ELIZABETH A. HANFT  
Assistant United States Attorneys

Before: HONORABLE BARBARA C. MOSES  
United States Magistrate Judge  
Southern District of New York

DOOR 4

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UNITED STATES OF AMERICA : COMPLAINT  
- v. - : 18 Mag.  
GODOFREDO LEANDRO GONZALEZ, : Violations of  
LUIS RAFAEL FEBRES MONASTERIO, : 46 U.S.C.  
MURVIN REIGOUD MAIKEL, : §§ 70503(a)(1),  
OMAR TORRES, : 70504(b)(2), and  
MOSES ROOPWAH, and : 70506(a) & (b) and 18  
NERIDIO-JULIAN SUCRE, : U.S.C. § 2  
Defendants. :  
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STATE OF NEW YORK )  
 ) ss.:  
COUNTY OF NEW YORK )

HEATH PETERSON, being duly sworn, deposes and says  
that he is a Special Agent with the Drug Enforcement  
Administration (the "DEA"), and charges as follows:

COUNT ONE  
(Conspiracy to Violate Maritime Drug Enforcement Laws)

1. In or about July 2018, on the high seas and elsewhere, GODOFREDO LEANDRO GONZALEZ, LUIS RAFAEL FEBRES MONASTERIO, MURVIN REIGOUD MAIKEL, OMAR TORRES, MOSES ROOPWAH, and NERIDIO-JULIAN SUCRE, the defendants, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the maritime drug enforcement laws of the United States.

2. It was a part and an object of the conspiracy that GODOFREDO LEANDRO GONZALEZ, LUIS RAFAEL FEBRES MONASTERIO,

MURVIN REIGOUD MAIKEL, OMAR TORRES, MOSES ROOPWAH, and NERIDIO-JULIAN SUCRE, the defendants, and others known and unknown, while on board a vessel subject to the jurisdiction of the United States, knowingly and intentionally would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 46, United States Code, Section 70503(a)(1).

3. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 46, United States Code, Section 70506(a) and Title 21, United States Code, Section 960(b)(1)(B).

(Title 46, United States Code, Sections 70506(b) and 70504(b)(2).)

COUNT TWO  
(Violation of Maritime Drug Enforcement Laws)

4. In or about July 2018, on the high seas and elsewhere, GODOFREDO LEANDRO GONZALEZ, LUIS RAFAEL FEBRES MONASTERIO, MURVIN REIGOUD MAIKEL, OMAR TORRES, MOSES ROOPWAH, and NERIDIO-JULIAN SUCRE, the defendants, while on board a vessel subject to the jurisdiction of the United States, knowingly and intentionally distributed and possessed with intent to distribute five kilograms and more of mixtures and substances containing a detectable amount of cocaine.

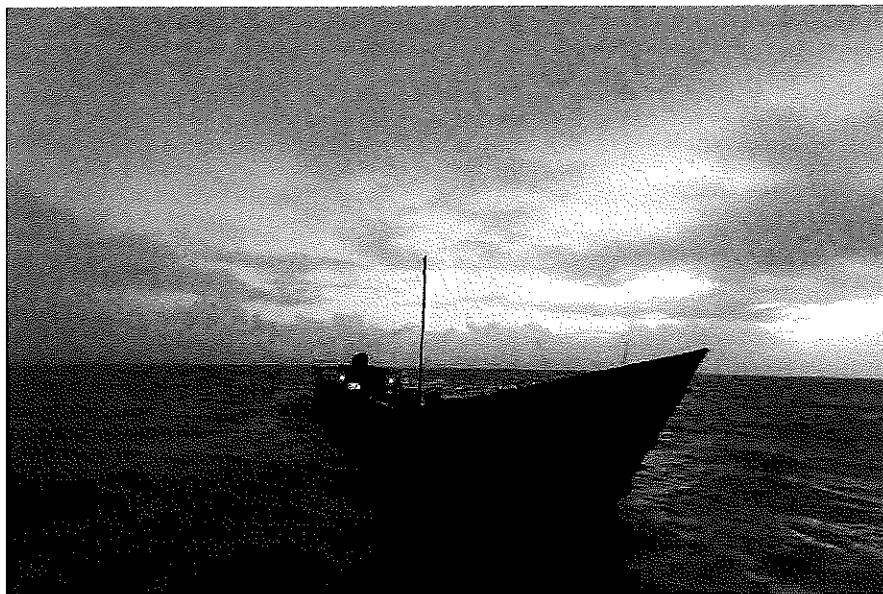
(Title 46, United States Code, Sections 70503(a)(1), 70504(b)(2), and 70506(a); Title 21, United States Code, Section 960(b)(1)(B); Title 18, United States Code, Section 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

5. I am a Special Agent with the DEA. This Affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Based on my participation in the investigation, my conversations with U.S. Coast Guard personnel and law enforcement agents, and my review of documents obtained during the investigation, I have learned, among other things, the following:

a. On or about July 27, 2018, two U.S. Coast Guard cutters (the "Cutters") operating in international waters approximately 350 nautical miles east of Diamond Valley, Barbados and more than 12 nautical miles from the coast of any country, detected a small, low-profile vessel, approximately 80 feet in length (the "Vessel") that appeared to be displaying no indicia of nationality, by flag or otherwise. A photograph depicting the Vessel is below:



b. The Cutters deployed U.S. Coast Guard personnel, who approached the Vessel and instructed the passengers on the Vessel to show themselves.

c. Six passengers, later determined to be GODOFREDO LEANDRO GONZALEZ, LUIS RAFAEL FEBRES MONASTERIO, MURVIN REIGOUD MAIKEL, OMAR TORRES, MOSES ROOPWAH, and NERIDIO-JULIAN SUCRE, the defendants, came out onto the Vessel's deck.

d. U.S. Coast Guard personnel then asked the purpose of the Vessel's voyage. GONZALEZ stated, in substance and in part, that he was the master of the Vessel, that the Vessel did not belong to anyone, that there was no documentation relating to the Vessel on board, and that the purpose of the Vessel's voyage was drug trafficking.

e. U.S. Coast Guard personnel subsequently boarded the Vessel (the "Boarding Team"). The Boarding Team inspected the Vessel and found no documents or indicia of the Vessel's nationality on board.

f. The Boarding Team also found what appeared, based on their training and experience, to be (i) an excessive quantity of fuel on board the Vessel; and (ii) an excessive supply of rations, which they believed, based on their training and experience, indicated that the passengers on the Vessel were intending to supply other vessels with additional fuel and rations.

g. Members of the Boarding Team observed mattresses in the crew berthing area of the Vessel. Below the mattresses and the wooden planks beneath those mattresses, the Boarding Team located bales, or large bundles (the "Bales"), wrapped in green and clear plastic and packed in duffel bags (the "Duffel Bags") that appeared, based on their training and experience, to contain narcotics. A photograph depicting some of the Bales in the Duffel Bags is below:



h. Two samples from the Bales field-tested positive for the presence of cocaine.

i. The Boarding Team recovered approximately 16 large duffel bags from the Vessel, each of which contained

Bales. In total, the contents of the Bales weighed approximately 624 kilograms.

j. The Boarding Team also recovered a magazine containing approximately 30 rounds of ammunition.

WHEREFORE, the deponent respectfully requests that warrants be issued for the arrests of GODOFREDO LEANDRO GONZALEZ, LUIS RAFAEL FEBRES MONASTERIO, MURVIN REIGOUD MAIKEL, OMAR TORRES, MOSES ROOPWAH, and NERIDIO-JULIAN SUCRE, the defendants, and that they be imprisoned or bailed, as the case may be.



Heath Peterson  
Special Agent  
Drug Enforcement Administration

Sworn to before me this  
3rd day of August 2018



HONORABLE GABRIEL W. GORENSTEIN  
Chief United States Magistrate Judge  
Southern District of New York

**Barbara Moses**  
United States Magistrate Judge  
Southern District of New York